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July 27, 2015

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Re: United States and New York ex rel. Lee, Luckie, and Gonzalez v. Northern Adult Daily Health Care Center and Deverman, Civ. No. CV 13-4933 (MKB)

Dear Parties:

We represent the Plaintiffs/Relators in the above-captioned matter. Attached please find:

- 1. Plaintiffs/Relators' Notice of Motion;
- 2. Plaintiffs/Relators' Memorandum of Law in Support of Motion for Alternate Remedies;
- 3. Declaration of Robert W. Sadowski in Support of Motion for Alternative Remedies;
- 4. Exhibit A to the Declaration of Robert W. Sadowski, Relators' Complaint dated September 3, 2013.

- 5. Exhibit B to the Declaration of Robert W. Sadowski, the Press Release for the Non-Prosecution Agreement Defendant Northern Adult Daily Health Care Center and the New York Attorney General's Medicaid Fraud Control Unit, dated August 12, 2014
- 6. Exhibit C to the Declaration of Robert W. Sadowski, the Non-Prosecution Agreement between Defendant Northern Adult Daily Health Care Center and the New York Attorney General's Medicaid Fraud Control Unit, dated June 26, 2014.
- 7. Exhibit D to the Declaration of Robert W. Sadowski, Relators' Amended Complaint, dated June 25, 2015.

Regards

Michael J. DeRienzo

Enc.

CC via electronic copy:

Noah Kinigstein, Esq. Petro Zinkovetsky, Esq.